

General privacy policy of the Stöcklin Group

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1. What is this privacy policy about?

Stöcklin Logistik AG and its group companies process personal data relating to you or other individuals in various ways and for various purposes. A list of the group companies can be found at www.stoecklin.com/de-ch/kontakt. Where we refer to

"Stöcklin Group," "we," or "us," this refers to the company responsible for data processing (see section 2).

"Personal data" refers to all information that can be associated with a specific person, and "process" means any handling of such data, e.g., collection, use, and disclosure.

This privacy policy explains how we process personal data (hereinafter referred to as "data") when

- you visit our website <https://www.stoecklin.com>
- you purchase our services or products,
- you are otherwise connected with us within the scope of a contract,
- You contact us via email, letter, social media, text message, contact form, etc.
- you register for certain offers (e.g., competitions) and our newsletter
- you deal with us in the context of all other data processing related to our offers,
- you provide us with your application documents via email, letter, or our applicant platform.

Please take the time to read this privacy policy to find out how and why the Stöcklin Group processes your personal data, how the Stöcklin Group protects your personal data, and what rights you have in this regard. If you have any questions or would like further information about our data processing, please do not hesitate to contact us (section 2).

We have aligned this privacy policy with both the Swiss Federal Act on Data Protection (FADP) and the European General Data Protection Regulation (GDPR). Where the term "personal data" is used in the privacy policy, this also refers to "personal data" as defined by the GDPR. However, whether and to what extent the GDPR applies depends on the individual case.

2. Who is responsible for processing your data?

For , data processing according to this privacy policy , is the following company the "controller," i.e., the body primarily responsible for data protection, unless otherwise communicated in individual cases (e.g., in further privacy policies, on forms, or in contracts):

Stöcklin Logistik AG

Wahlenstrasse 161
4242
Laufen,
Switzerland

If you are in contact with another group company, e.g. because you or your company receive a service from this company or because you correspond directly with this company, the company in question is the responsible party.

If you have any questions about data protection, please feel free to contact us at the following address so that we can process your request as quickly as possible: datenschutz@stoecklin.com

3. What personal data do we process?

We process different categories of personal data depending on the occasion and purpose. The most important categories are listed below, although this list cannot be exhaustive.

We process less personal data for contractual partners that are companies because the applicable data protection law only covers data relating to natural persons (i.e., people). However, we process data relating to the contact persons with whom we are in contact, e.g., name, contact details, professional details, and information from communications, as well as information about managers, etc., as part of the general information about companies with which we work.

You provide us with much of the data mentioned in this section yourself (e.g., via forms, in communication with us, in connection with contracts, when using the website, when submitting application documents, etc.). If you wish to conclude contracts with us or make use of our services, you must also provide us with data as part of your contractual obligations under the relevant contract, in particular master data and contract data.

If you transmit or disclose data about other persons to us, such as information about family members or work colleagues, we assume that you are authorized to do so and that this data is correct. By transmitting data about third parties, you confirm this. Please also ensure that these third parties have been informed about this privacy policy (e.g., by referring to this privacy policy).

3.1. Master data

We define master data as the basic data that we need for the processing of our business relationships or for marketing and advertising purposes and that relates directly to your person and characteristics. In particular, we process the following master data, for example:

- Title, last name, and first name
- Address, contact details such as email address, telephone number, and mobile number

If necessary and justified in the respective case, we process

- nationality and residence permit status, gender, and date of birth
- Further information from identification documents
- Family data (e.g., marital status)
- Information on language preferences
- Details on professional profile and employment (e.g. application documents, employment relationship, employer, start date) and, if applicable, training
- Information on income and financial situation (e.g., gross income, rent, and assets)
- Information on your living situation
- For company contacts, also relationships to the company you work for
- Customer history
- Signatory authorizations and declarations of consent

We usually receive this master data from you yourself, but in some cases also from other persons working for your company. We may also obtain personal data from third parties, e.g. from agencies you work for, or from third parties such as our contractual partners, associations, and address brokers, and from publicly accessible sources such as public registers or the Internet (websites, social media, etc.).

3.2. Contract data

Contract data is information that arises in connection with the conclusion or execution of a contract, e.g., information about contracts and the services to be provided or provided, as well as data from the period prior to the conclusion of a contract, information about the conclusion of the contract itself (e.g., the date of conclusion and the subject matter of the contract), and the information required or used for the execution of the contract. We process the following contract data, for example:

- Date, application process, information about the type, duration, and conditions of the contract in question, data on the termination of the contract
- Contact details and delivery addresses
- Information about the use of services
- Information about payments and payment methods, invoices, mutual claims, contacts with customer service, complaints, defects, returns, information about customer satisfaction, complaints, feedback, etc.
- For services available online, also access data and logins

We receive this data from you, but also from partners with whom we collaborate. Again, this data may relate to your company, in which case it is not "personal data," but it may also relate to you if you work for a company or if you yourself purchase services from us.

3.3. Communication data

Communication data is data related to our communication with you, e.g., when you contact us via the contact form or other means of communication. Communication data includes, for example

- Name and contact details such as postal address, email address, and telephone number
- Content of correspondence (e.g., from emails, written correspondence, telephone calls, chat messages, etc.)
- Responses to customer and satisfaction surveys
- Information on the type, time, and, where applicable, location of communication and other peripheral data relating to communication.

If, in exceptional cases, we record a telephone conversation or TEAMS call, we will inform you at the beginning of the conversation. If you do not agree to the recording and storage of the conversation, you also have the option of terminating the conversation or contacting us via other communication channels.

3.4. Technical data

Technical data is collected in connection with the use of our website. This includes, for example, the following data:

- IP address of the end device and device ID
- Information about your device, the operating system of your end device, or language settings
- Information about your Internet service provider
- Content accessed or logs in which the use of our systems is recorded
- Date and time of access to the website and your approximate location
- Information about the content and files accessed in the user account
- Further information generated when using the user account, such as sending the access code via push notification for logging into your user account via the website

We may also assign an individual code to you or your device (e.g., through a cookie; see Section 5.1). This code is stored for a certain period of time, often only during your visit. We cannot usually deduce who you are from technical data unless you register for the newsletter on our website, for example. In this case, we can link technical data with master data—and thus with your person.

3.5. Behavioral data

In order to tailor our offers and services to you and your company in the best possible way, we try to get to know you better. To do this, we collect and use data about your behavior. Behavioral data is, in particular, information about your use of our website. It can also be collected on the basis of technical data. This includes, for example, information about your use of electronic communications (e.g., whether and when you opened an email or clicked on a link, especially when sending newsletters). We may also use your other interactions with us as behavioral data, and we may link behavioral data with other data (e.g., with anonymous information from statistical offices) and evaluate this data on a personal and non-personal basis.

3.6. Preference data

Preference data provides us with information about your likely needs and which services may be of interest to you or your company (e.g., when selecting topics for the newsletter). We therefore also process data relating to your interests and preferences. To do this, we may link behavioral data with other data and evaluate this data on a personal and non-personal basis. This enables us to draw conclusions about characteristics, preferences, and likely behavior.

3.7. Other data

We may also collect data from you in other situations. In connection with official or legal proceedings, for example, data (such as files, evidence, etc.) may be generated that may also relate to you. We may receive or produce photos, videos, and audio recordings in which you may be recognizable (e.g., at events, through security cameras, etc.). We may also collect data about who enters certain buildings or has access rights to them (including access controls based on registration data or visitor lists, etc.), who participates in events or activities (e.g., competitions) and when, or who uses our infrastructure and systems and when.

4. For what purposes do we process your personal data?

We use the personal data we collect primarily to process your orders and manage our customer relationships. If you have subscribed to our newsletter, we use your email address to send it to you. In addition, we process your personal data, to the extent permitted and as we deem appropriate, for other purposes in which we (and sometimes third parties) have a legitimate interest:

- For **communication purposes**, i.e., to contact you and maintain contact with you. This includes responding to inquiries and contacting you if we have any questions, e.g., by email. For this purpose, we process your communication and master data in particular.
- For **customer care and marketing purposes**, to provide you with targeted information about offers based on your personal interests and preferences, e.g. through newsletters and personalized advertising. For this purpose, we process technical data, master data, communication data, and behavioral data in particular.
- We also process data to **improve our services and for product development**.

- **To ensure IT security and for prevention:** We process personal data to monitor the performance of our operations, in particular IT, our website, applications, and other platforms, for security purposes, to ensure IT security, to prevent theft, fraud, and misuse, and for evidence purposes. This includes, for example, the evaluation of system-side records of the use of our systems (log data), the prevention, defense, and investigation of cyberattacks and malware attacks, analyses and tests of our networks and IT infrastructures, and system and error checks.
- **To uphold our property rights and other measures for IT, building, and facility security** and to protect our employees and other persons and assets belonging to us or entrusted to us (such as access controls, visitor lists, network and mail scanners, telephone recordings).
- **To protect our legal rights:** We may also process personal data in order to enforce claims in court, in or out of court, and before authorities in Switzerland and abroad, or to defend ourselves against claims. Master data and communication data may be processed for this purpose.
- **To comply with legal requirements:** This includes, for example, processing complaints and other reports, complying with court or regulatory orders, measures to detect and investigate abuse, and general measures to which we are obliged under applicable law, self-regulation, or industry standards. For this purpose, we may process your master data and communication data in particular.
- **For administration and support:** In order to make our internal processes efficient, we process data as necessary for IT administration, accounting, or data archiving. For this purpose, we may process communication and behavioral data as well as technical data in particular.
- **To initiate an employment relationship** and assess suitability for the advertised position and to store your data in our applicant platform
- We may also process data for **other purposes**. These include corporate management, including business organization and corporate development, other internal processes and administrative purposes (e.g., master data management, accounting, and archiving), training and education purposes, and the preparation and execution of the purchase and sale of business units, companies or parts of companies and other corporate transactions and the associated transfer of personal data, as well as measures for business management and the protection of other legitimate interests.

If we ask for your consent for certain processing operations, we will inform you separately about the relevant purposes of the processing. You can revoke your consent at any time by sending us a written notification.

5. What online tracking and online advertising techniques do we use?

We use various techniques on our website that enable us and third parties we engage to recognize you when you use our website and, in some cases, to track you across multiple visits. The use of such techniques is specifically regulated. We will inform you about this in this section.

5.1. How and why do we use cookies and similar technologies?

We use third-party services for our website to measure and improve the **user-friendliness of the website and online advertising campaigns**. To do this, we may integrate third-party components into our website that may use cookies. When we track you or use similar technologies, the main purpose is to distinguish your access (via your system) from that of other users so that we can ensure the functionality of the website and perform statistical analyses. We do not want to infer your identity. The technologies used are designed in such a way that you are recognized as an individual visitor each time you visit a page, for example by our server (or the servers of third parties) assigning you or your browser a specific identification number (known as a "cookie").

Cookies are files that your browser automatically stores on your device when you visit our website. Cookies contain a unique identification number (an ID) that allows us to distinguish individual visitors from others, but usually without identifying them. Depending on their purpose, cookies contain additional information, e.g. about the pages accessed and the duration of a visit to a page. We use session cookies, which are deleted when you close your browser, and persistent cookies, which remain stored for a certain period of time after you close your browser and are used to recognize visitors when they return to the website.

We use the following types of cookies and similar technologies:

- **Necessary cookies:** Necessary cookies are required for the functionality of the websites, e.g. so that you can switch between pages without losing information entered in a form.
- **Performance cookies:** These cookies collect information about how a website is used and enable analysis, e.g., which pages are most popular. This makes it easier to visit a website and improves user-friendliness.
- **Functional cookies:** Functional cookies enable advanced features and can display personalized content.
- **Marketing cookies:** Marketing cookies help us and our advertising partners to target you on our websites and on third-party websites with advertisements for products or services that may be of interest to you, or to display our advertisements when you continue to use the internet after visiting our websites.

We use cookies for the following purposes in particular:

- Personalization of content
- Displaying personalized advertisements and offers

- Displaying advertisements on third-party websites and measuring their success, i.e., whether you respond to these advertisements (remarketing)
- Saving settings between your visits
- Determining whether and how we can improve our website
- Collecting statistical data on the number of users and their usage habits, as well as improving the speed and performance of the website
- We may process your contact details to target you with advertising on third-party platforms.

We may also use similar technologies, such as LinkedIn Insight Tags, pixel tags, or fingerprints to store data in the browser. Pixel tags are small, usually invisible images or program code that are loaded from a server and thereby transmit certain information to the server operator, e.g., whether and when the website was visited. Fingerprints are information collected during your visit to our website about the configuration of your device or browser, which distinguishes your device from other devices.

5.2. How can cookies and similar technologies be deactivated?

When you visit our website, you have the option of enabling or disabling certain categories of cookies. You can configure your browser settings to block certain cookies or similar technologies, or to delete existing cookies and other data stored in your browser. You can also enhance your browser with software (known as "plug-ins") that blocks tracking by certain third parties. You can find more information on this in your browser's help pages (usually under the keyword "data protection"). Please note that our website may no longer function fully if you block cookies and similar technologies.

5.3. Cookies from partners and third parties on our website

We use third-party services to measure and improve the user-friendliness of our website and online advertising campaigns. Third-party providers may also be located outside Switzerland and the EU/EEA, provided that the protection of your personal data is adequately ensured. For example, we use analytics services to optimize and personalize our website. The relevant third-party providers may record the use of the website for this purpose and combine their records with further information from other websites. This enables them to record user behavior across multiple websites and devices in order to provide us with statistical evaluations on this basis. Providers may also use this information for their own purposes, e.g., for personalized advertising on their own website or other websites. If a user is registered with the provider, the provider can assign the usage data to the person concerned.

Two of the most important third-party providers are Google and YouTube. You can find more information about these in our cookie policy (<https://www.stoecklin.com/de-ch/cookie-richtlinie>). Other third-party providers generally process personal and other data in a similar manner.

- **Google Analytics**, an analytics service provided by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA, USA) and Google Ireland Ltd. (Google Building Gordon House, Barrow St, Dublin 4, Ireland; both collectively referred to as "Google," with Google Ireland Ltd. being responsible for the processing of personal data). Google uses cookies and similar

Technologies for collecting certain information about the behavior of individual users on or in the relevant website and the end device used (tablet, PC, smartphone, etc.). Google collects information about user behavior on the website and the device used and provides us with evaluations based on this information, but also processes certain data for its own purposes. We have configured Google Analytics so that visitors' IP addresses are anonymized before being forwarded to the US. You can deactivate Google Analytics by installing a corresponding browser add-on. For more information, please see our cookie policy.

- **Meta Pixel**, an analytics tool from Meta Platforms Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland). This allows us to control ads on Meta and Meta's partners so that they are only shown to users who are likely to be interested in them. We can also measure the effectiveness of such ads for statistical purposes and market research. We are jointly responsible with Meta for the exchange of data obtained by Meta for the purpose of displaying personalized ads, improving ad delivery, and personalizing content. The data is stored on servers in the EU/EEA and the US. Users can direct information requests and other inquiries directly to Meta. For more information about Meta's privacy policy and corresponding settings options, please refer to our cookie policy.
- **LinkedIn Insight Tag**, an analytics tool from LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland). LinkedIn Tag informs us that you have visited our website, and your IP address is also collected. In addition, timestamps and events such as page views are stored. This enables us to statistically evaluate your use of our website in order to continuously optimize it. For example, we learn which LinkedIn ad or interaction on LinkedIn brought you to our website. This allows us to better control the display of our advertising. The data is stored on servers in the EU/EEA and the US. We have configured LinkedIn Insight Tag so that visitors' IP addresses are truncated or hashed before being forwarded to the US. Please note that LinkedIn may store the data so that it can be linked to the respective user profile and LinkedIn can use the data for its own advertising purposes. Further information on LinkedIn's data protection and corresponding setting options can be found [here](#).

6. How do we process data in connection with social media?

On our website, we offer you the option of using a "social media plugin" from Facebook, Instagram, LinkedIn, Twitter, etc. to integrate the functions of these providers into our websites. These plugins are disabled by default. As soon as you activate them (e.g., by clicking on the button), the respective providers can determine that you are on our website. If you have an account with the social media provider, they can assign this information to you and thus track your use of online services.

We are generally jointly responsible with the relevant providers for the exchange of data that these providers collect via plugins or similar functions (but not for further processing by a provider). Where possible, we have concluded a corresponding supplementary agreement with the provider. You can address requests for information and other data subject inquiries in connection with joint responsibility directly to the provider concerned.

7. To whom do we disclose your personal data?

In connection with our processing activities, we also disclose your personal data to other recipients.

We may pass on personal data that we receive from you or from third-party sources, in particular to other companies within the Stöcklin Group (see section 2). Such disclosure may serve the purposes of internal group administration or support for the group companies concerned and their own processing purposes, e.g. for the personalization of marketing activities or the development and improvement of services.

We also disclose personal data to service providers as necessary for them to perform their services. This applies in particular to IT service providers, but also to consulting firms, analysis service providers, debt collection service providers, credit agencies, marketing service providers, etc.

Data may also be disclosed to other recipients, e.g., to courts and authorities in the context of proceedings and legal information and cooperation obligations, to buyers of companies and assets, to financing companies in the case of securitizations, and to debt collection companies.

In individual cases, we may also disclose personal data to other third parties for their own purposes, e.g., if you have given us your consent to do so or if we are legally obliged or entitled to disclose such data.

Insofar as service providers process personal data as contract processors, they are obliged to process personal data exclusively in accordance with our instructions and to take measures to ensure data security.

8. Do we disclose personal data abroad?

Recipients of data are not only located in Switzerland. This applies in particular to companies belonging to the Stöcklin Group and certain service providers. These may also be located outside the European Economic Area (EEA) and Switzerland, e.g. in the USA and Mexico, but also in other countries worldwide. We may, for example, transfer data to authorities and other persons abroad if we are legally obliged to do so or, for example, in the context of a company sale or legal proceedings. Not all of these countries currently guarantee a level of data protection equivalent to that provided by Swiss law. We compensate for the lower level of protection by means of appropriate contracts, in particular the standard contractual clauses issued by the European Commission and recognized by the Swiss Federal Data Protection and Information Commissioner (FDPIC).

In certain cases, we may also transfer data in accordance with data protection regulations without such agreements, e.g., if you have consented to the disclosure or if the disclosure is necessary for the performance of a contract, for the establishment, exercise, or enforcement of legal claims, or for overriding public interests.

9. How long do we process personal data?

We store and process your personal data for as long as it is necessary for the purpose of processing (in the case of contracts, usually for the duration of the contractual relationship), as long as we have a legitimate interest in storing it (e.g., to enforce legal claims, for archiving purposes, and/or to ensure IT security), and as long as data is subject to a legal retention obligation (e.g., a ten-year retention period applies to certain data). If there are no legal or contractual obligations to the contrary, we destroy or anonymize your data after the storage or processing period has expired as part of our usual procedures.

We store **personal data** in connection with an application process for a period of 6 months and then anonymize it. If an employment contract is concluded, the application documents are transferred to the personnel file and stored in accordance with the applicable statutory retention periods.

We generally retain **master data** for 10 years from the last exchange with you, but at least until the end of the contract. This period may be longer if necessary for reasons of evidence or to comply with legal or contractual requirements, or if technically necessary. For purely marketing and advertising contacts, the period is usually much shorter, usually no more than 2 years since the last contact.

We generally retain **contract data** for 10 years from the last contract activity, but at least from the end of the contract. This period may be longer if necessary for reasons of evidence or to comply with legal or contractual requirements, or if technically necessary.

We anonymize or delete your behavioral and preference data when it is no longer relevant for the purposes pursued, which may be between 2-3 weeks (for movement profiles) and 24 months (for product and service preferences), depending on the type of data. This period may be longer if necessary for reasons of evidence or to comply with legal or contractual requirements, or if technically necessary.

With regard to cookies, you can find information on the retention period under the link "Cookie settings."

10. What is the legal basis for data processing?

Depending on the circumstances, data processing is only permitted if specifically allowed by applicable law. This does not apply under Swiss data protection law, but does apply under the GDPR, for example, insofar as it is in application. In this case, we base the processing of your personal data on the following legal bases:

- your consent (Art. 6 para. 2 lit. b DSG and Art. 5 para. 7 DSG, as well as Art. 6 para. 1 lit. a and Art. 9 para. 2 lit. a GDPR);
- that processing is necessary for the performance of a contract or for taking steps prior to entering into a contract (e.g., reviewing a contract application; Art. 6 para. 2 lit. a DSG, as well as Art. 6 para. 1 lit. b GDPR);
- that processing is necessary for the establishment, exercise, or defense of legal claims or civil proceedings (Art. 6 para. 1 lit. f and Art. 9 para. 2 lit. f GDPR);
- that processing is necessary for compliance with domestic or foreign legal provisions (Art. 6 para. 7 DSG and Art. 6 para. 1 DSG, as well as Art. 6 para. 1 lit. c and lit. f; Art. 9 para. 2 lit. g GDPR);
- processing is necessary for a legitimate interest in data processing, in particular the interests mentioned in section 4 (Art. 6 (1) DSG, as well as Art. 6 (1) lit. f GDPR).

11. How do we protect your data?

We take appropriate security measures to maintain the confidentiality, integrity, and availability of your personal data, to protect it against unauthorized or unlawful processing, and to counteract the risks of loss, accidental alteration, unintentional disclosure, or unauthorized access. However, security risks cannot generally be completely ruled out; residual risks are unavoidable.

12. What are your rights?

Under applicable data protection law, you have certain rights that allow you to obtain further information about our data processing and to influence it. These are, in particular, the following rights:

- **Right to information:** You can request further information about our data processing. We are happy to assist you in this regard. You can also submit a so-called request for information if you would like further information and a copy of your data.
- **Objection and deletion:** You can object to our data processing and also request at any time that we delete your personal data if we are not obliged to continue processing or storing this data and if it is not necessary for the performance of the contractual relationship.
- **Correction:** You can correct or complete incorrect or incomplete personal data or have it supplemented with a note of dispute.
- **Transfer:** You also have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format or to have it transferred to a third party, provided that the corresponding data processing is based on your consent or is necessary for the performance of a contract.
- **Revocation:** If we process data on the basis of your consent, you can revoke your consent at any time. The revocation only applies to the future, and we reserve the right to continue processing data on another basis in the event of revocation.

Please note that these rights are subject to legal requirements and restrictions and are therefore not available in full in every case. In particular, we may need to continue processing and storing your personal data in order to fulfill a contract with you, to protect our own legitimate interests, such as the assertion, exercise, or defense of legal claims, or to comply with legal obligations. To the extent permitted by law, in particular to protect the rights and freedoms of other data subjects and to safeguard legitimate interests, we may therefore reject a data subject's request in whole or in part (e.g., by blacking out certain content relating to third parties or our trade secrets).

If you wish to exercise your rights against us, please contact us in writing. Our contact details can be found in section 2. As a rule, we will need to verify your identity (e.g., by means of a copy of your ID). You are also free to lodge a complaint with the competent supervisory authority regarding our processing of your data. The competent supervisory authority in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC).

Status of the privacy policy: February 2026